

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)
)
GREEN COPPER HOLDINGS, LLC) **CASE NO. 25-10088-T**
EIN # xx-xxx9708) **Chapter 7**
)
)
Debtor.)

TRUSTEE'S MOTION TO EMPLOY PROFESSIONAL PERSON

Comes now the Trustee and states:

1. Among the assets of this estate are real estate located at 510 Dewey Avenue in Bartlesville, Oklahoma referred to as the “Price Tower”; personal tangible property located on or in the Price Tower (“Personalty”); and the right to use the name Price Tower. These assets are collectively referred to herein as the “Price Tower Assets.”
2. The Trustee desires to employ a realtor to assist in marketing and selling the Price Tower Assets.
3. Scott Schlotfelt (“Schlotfelt”) of Cushman & Wakefield Commercial Realtors is qualified and competent to provide these services.
4. Prior to the commencement of these proceedings, Schlotfelt was employed by the Debtor to market and sell these assets. However, as of the date of bankruptcy, Schlotfelt was not a creditor and did not hold or represent an interest that was adverse to the interests of this estate. Attached as **Ex A** is his *Rule 2014 Declaration*. Schlotfelt is a disinterested person as defined by the Bankruptcy Code.

5. Attached as **Ex B** is a proposed listing agreement. As noted, the estate has entered into a proposed Asset Purchase Agreement (“APA”) with McFarlin Building LLC (“McFarlin”) to sell the specified assets for the sum of \$1.4 million. That APA is subject to Bankruptcy Court approval and the submission of competitive bids. Pursuant to **Ex B** in the event the sale of the specified assets to McFarlin closes for the sum of \$1.4 million Schlotfelt shall not be entitled to a commission. In the event the sale closes to McFarlin for a sum greater than \$1.4 million as result of a private auction, Schlotfelt shall be entitled to a commission of 3% of the ultimate sales price in excess of \$1.4 million. In the event the sale closes to a bidder other than McFarlin, Schlotfelt shall receive a commission of 3% of the sales price.
6. The Trustee asserts that Schlotfelt is qualified and competent to perform the services specified and employment of him for the reasons stated herein is in the best interests of the estate.

Wherefore the Trustee prays for an order authorizing employment of Schlotfelt of Cushman & Wakefield Commercial Realtors for the reasons stated and pursuant to the terms set forth in the listing agreement attached hereto as Ex B.

Respectfully Submitted By:

s/ Patrick J. Malloy III
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